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Marc J. Randazza, (NV Bar No. 12265) Ronald D. Green (NV Bar No. 7360) Alex J. Shepard, (NV Bar No. 13582) RANDAZZA LEGAL GROUP, PLLC 2764 Lake Sahara Drive, Suite 109 Las Vegas, NV 89117 Telephone: 702-420-2001 ecf@randazza.com

Attorneys for Defendants, Stephen Fairfax and MTechnology

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

SWITCH, LTD., a Nevada limited liability company, Plaintiff,

VS.

STEPHEN FAIRFAX; MTECHNOLOGY; DOES 1 through 10; and ROE ENTITITIES 11 through 20, inclusive,

Defendants.

Case No. 2:17-cv-02651-GMN-VCF

STIPULATION AND (PROPOSED)
ORDER TO STAY PROCEEDINGS

IT IS HEREBY STIPULATED and agreed by and between Plaintiff, Switch, Ltd. ("PLAINTIFF") and Defendants Stephen Fairfax and MTechnology ("DEFENDANTS") by and through their respective undersigned counsel as follows:

- 1. The aforesaid parties are currently engaged in good-faith settlement negotiations.
- 2. Further, the parties are currently in the process of engaging in informal discovery to attempt to resolve this lawsuit, have chosen an e-discovery provider for the purposes of engaging in informal discovery, and are currently in final negotiations regarding the parameters of informal discovery.

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- 3. In the meantime, to facilitate informal discovery and potential settlement and to minimize attorneys' fees and other legal expenses, the parties believe that the present civil action should be stayed, including a stay on subsequent deadlines.
- 4. Therefore, the parties agree that the Court may enter the following order and request that the Court do so accordingly:
- a. Except as otherwise provided below, this action shall be stayed for a period of 120 days from the date this stipulation is filed with the Court, or Friday, May 24, 2019;
- b. The stay shall immediately terminate at midnight on Friday, May 24, 2019; and
- c. The parties stipulate that nothing in this delay shall be deemed to prejudice either party.

## IT IS SO STIPULATED.

Dated this 25th day of January 2019.

RANDAZZA LEGAL GROUP, PLLC

## /s/Ronald D. Green

Marc J. Randazza, NV Bar # 12265 Ronald D. Green, NV Bar # 7360 Alex J. Shepard, NV Bar # 13582 RANDAZZA LEGAL GROUP, PLLC <ecf@randazza.com> 2764 Lake Sahara Drive, Suite 109 Las Vegas, NV 89117

Attorneys for Defendants, Stephen Fairfax and MTechnology WEIDE & MILLER, LTD.

## /s/ Christopher Austin

F. Christopher Austin, Esq. 10655 Park Run Drive, Suite 100 Las Vegas, Nevada 89144 <caustin@weidemiller.com>

Attorney for Plaintiff, Switch, Ltd

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